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tion was therefore upheld. Justices, Gummere, Parker, Bergen, Vorhees, and Gray, dissenting.

Every Man His Own Lawyer.—Whether plaintiff was a subscriber to some publication which purported to lay down the law in terms so plain that he who runs may read does not appear; but certain it is that Mr. Hall, of somewhere in Iowa, decided to carry on his own litigation without the services of an attorney, as appears from the report of the decision of the Iowa Supreme Court in *Hall v. Chicago, B. & Q. R. Co.*, 124 Northwestern Reporter, 1073. His petition stated, in substance, that he had had considerable litigation with defendant, which it had defended at great cost, which would eventually have to be paid by himself and other members of the general public by reason of increased rates, and prayed that the legal department of the railroad company be restrained from carrying on such litigation in disregard of the rights of plaintiff and of the general public. It is scarcely necessary to say that a demurrer to the petition was sustained.

Conflicting Jurisdiction of Federal and State Courts.—The recurring question of the conflicting jurisdiction of the federal and state courts is again discussed by the Supreme Court of the United States in *McClellan v. Carland*, United States District Judge, 30 Supreme Court Reporter, 501. It appeared that the Circuit Court of the United States for the District of South Dakota, having an action before it to determine the interest of the complainants in a certain estate on which issue had been joined, on the application of the state of South Dakota, refused to permit it to intervene to set up its right to the property of the estate on the claim that decedent died without legal heirs, and stayed the proceedings before it until the state could bring an action in the state court to determine such rights. In making such an order the Supreme Court holds that the circuit court was in error because, as the record showed, it had acquired jurisdiction, and the issues were made up when the state intervened, and it practically turned the case over for determination to the state court. This it had no authority to do, and the Circuit Court of Appeals, on the record before it showing such fact, should have issued mandamus to require the judge of the Circuit Court to show cause why he did not proceed to hear and determine the case.